

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA )  
 ) 1:14-cr-00021-JL  
 v. )  
 )  
 LEONARDO ALMONTE-RAMIREZ )

**JOINT STIPULATION OF THE PARTIES REGARDING THE SPEEDY TRIAL ACT**

On October 30, 2014, the Court requested that the parties file a Joint Speedy Trial Act Stipulation setting forth: (a) the applicable periods of elapsed time; and (b) the applicable periods of excludable time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq. The parties hereby agree as follows:

1. The Speedy Trial clock began with the defendant's arraignment on March 18, 2014, 18 U.S.C. § 3161(c)(1);
2. On March 14, 2014, the defendant filed a Motion to Continue the Trial, which stopped the Speedy Trial clock, 18 U.S.C. § 3161(h)(1)(D);
3. On March 20, 2014, the Court granted the Motion to Continue the Trial, and scheduled jury selection for June 17, 2014. Accordingly, the Speedy Trial Clock was stopped until June 16, 2014 (the day prior to jury selection), 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A);
4. On June 4, 2014, the defendant filed a Motion to Continue the Trial, which continued the stoppage of the Speedy Trial clock, 18 U.S.C. § 3161(h)(1)(D);
5. On June 5, 2014, the Court granted the Motion to Continue the Trial, and scheduled jury selection for July 8, 2014. Accordingly, the Speedy Trial clock was stopped until July 7, 2014 (the day prior to jury selection), 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A);

6. On the day of jury selection and trial, July 8, 2014, the defendant terminated his retained counsel and moved for a further continuance of the trial, which continued the stoppage of the Speedy Trial clock, 18 U.S.C. § 3161(h)(1)(D);
7. On July 8, 2014, the Court granted the defendant's Motion to Continue the Trial, and scheduled jury selection for September 3, 2014. Accordingly, the Speedy Trial clock remained stopped until September 2, 2014 (the day prior to jury selection), 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A);
8. On August 19, 2014, the defendant, having retained new counsel, filed a Motion to Continue the Trial, which continued the stoppage of the Speedy Trial clock, 18 U.S.C. § 3161(h)(1)(D);
9. On August 20, 2014, the Court granted the Motion to Continue the Trial, and scheduled jury selection for November 4, 2014. Accordingly, the Speedy Trial clock remained stopped until November 3, 2014 (the day prior to jury selection), 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A).
10. On October 16, 2014, the defendant filed a Motion to Continue the Trial, which continued the stoppage of the Speedy Trial Clock, 18 U.S.C. § 3161(h)(1)(D);
11. On October 17, 2014, the Court granted in part the defendant's Motion to Continue the Trial, and scheduled jury selection for December 9, 2014. Accordingly, the Speedy Trial clock was stopped until December 8, 2014 (the day prior to jury selection), 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A).
12. On October 27, 2014, the defendant filed another Motion to Continue the Trial, which continued the stoppage of the Speedy Trial clock, 18 U.S.C. § 3161(h)(1)(D);

13. On October 30, 2014, the Court granted the defendant's Motion to Continue the Trial, and scheduled jury selection for February 3, 2015. Accordingly, the Speedy Trial clock will be stopped until February 2, 2015 (the day prior to jury selection), 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A).

14. In light of the above, 70 days remain on the Speedy Trial clock.

Respectfully submitted,

JOHN P. KACAVAS  
United States Attorney

By: /s/ Nick Abramson  
Nick Abramson  
Assistant U.S. Attorney  
Massachusetts Bar # 672267  
53 Pleasant Street, 4<sup>th</sup> Floor  
Concord, New Hampshire 03301  
Nick.Abramson@usdoj.gov

Dated: October 30, 2014

/s/ Bill Sullivan  
Sullivan & Sullivan  
25 Railroad Square  
Haverhill, MA 01832  
(978) 521-6801

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of October, 2014, a copy of the Joint STA Stipulation was electronically served upon Bill Sullivan, Esq., counsel for the defendant.

/s/ Nick Abramson

Nick Abramson  
Assistant U.S. Attorney